

REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments and arguments set forth fully below. Claims 1, 2, 4, 6, 12, 14, 16, 19-21 and 25-33 were previously pending in the instant application. Within the Office Action, Claims 1, 2, 4, 6, 12, 14, 16, 19, 26, 27, 31 and 32 have been withdrawn and Claims 20, 21, 25, 28, 30 and 33 have been rejected. By way of the above amendments, Claims 1, 2, 12, 16, 20, 25-33 have been amended. Accordingly, Claims 1, 2, 4, 6, 12, 14, 16, 19-21 and 25-33 are still pending in this application.

Withdrawal of Claims:

Within the Office Action Claims 1, 2, 4, 6, 12, 14, 16, 19, 26, 27, 31 and 32 have been withdrawn because the use of the terms “first region” and “second region” being used inversely in the Claims with respect to the first region (131) and the second region (135), as labeled in the Fig. 1B. Each of the independent Claim 1, 12, 26 and 31 have been amended such the terms “first region” and “second region” are matched with the first region (131) and the second region (135), as labeled in the Fig. 1B.

Objection to Claims:

Within the Office Action Claims 12, 25, 26, 29, 30 and 33 have been objected to for a number of informalities. By way of the above amendment Claims 12, 25, 26, 29, 30 and 33 have been amended to correct these informalities.

Rejections Under 35 U.S.C. § 102(b)

Within the Office Action, Claims 20 and 28 have been rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6,032,313 to Tsang (hereafter, “Tsang”). The rejection of Claims 20 and 28 as being anticipated by Tsang is considered moot in view of the above amendments.

Tsang fails to teach multiple support surfaces that move in different directions or coaxially rotatable sections each with squeegees elements with opposed walls that form an elongated wiping edges, such as recited in the independent Claim 20 or continuous and elongated wiping edges, such as recited in the independent Claim 28. A squeegee member clearly means an elongated structured with opposed elongated walls that form a corresponding elongated top wiping edge. A squeegee member 98 has a protruding edge, or cleaning edge, 101 that contacts a

surface during a cleaning operation. The squeegee member 98 is elongated in an elongation direction 107 with two elongated squeegee walls 103/104. **At any point on the surface of the squeegee walls** 103/104, the squeegee member 98 has a squeegee wall thickness 105. [see Page 11, lines 2-6 of the Application Serial No. 10/382,559, filed March 5, 2003, and titled "DENTITION CLEANING DEVICE AND SYSTEM," from which the present Application claim priority and which has been incorporated by reference] Accordingly, a squeegee structure can not be construed as meaning a polishing pad.

Rejections Under 35 U.S.C. § 103(a)

Within the Office Action, Claim 21, 29 and 30 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Tsang in view U.S. Patent No. 5, 289,605 to Armbruster (hereafter, "Armbruster")

Claim 21 is dependents from the independent Claim 20; Claim 29 and 30 both dependent from the independent Claim 28. As described above, the independent Claims 20 and 28 are both allowable over the teachings of Tsang. Accordingly, Claims 21, 29 and 30 are also all allowable as being dependent on allowable base claims.

In anticipation of any further rejections of the claims under 35 U.S.C. § 103(a) as being unpatentable over Tsang in view Armbruster, the applicant contend that the combination of independently movable region with combinations of squeegees and bristle is patentable over the teachings of Tsang, Armbruster and their combination.

Rejections Under 35 U.S.C. § 102(e)

Within the Office Action Claims 25 and 33 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Publication No. 2004/0154112 to Braun (hereafter, "Braun")

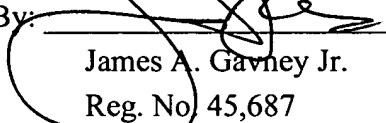
As stated previously, Braun *does not* qualify as prior art. Attention is respectfully drawn to the Provisional Application No. 60/439,317, filed January 10, 2003, from which the present Application claim priority. The Provisional Application No. 60/439,317, filed January 10, 2003 clearly teaches multiple regions that move separately (**Fig. 4A**), as well as a polishing cup with bristle surrounding the polishing cup and being configured to move **Fig. 5M**. Further, the Provisional Application No. 60/439,317, filed January 10, 2003 clearly teaches that the each of the regions can include bristle, squeegees, nodules and combinations thereof (Figures and

Specification). Accordingly, Applicants respectfully request the rejection of Claim 25 and 33 under 35 U.S.C. § 102(e) as being anticipated by Braun be withdrawn.

For the reasons given above, Applicants respectfully submit that Claims 1, 2, 4, 6, 12, 14, 16, 19-21 and 25-33 are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, the Examiner is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

Dated: 1/10/2006


By: 
James A. Gavney Jr.
Reg. No. 45,687

Agent for Applicant(s)

CERTIFICATE OF MAILING (37 CFR § 1.8(a))

I hereby certify that this paper (along with any referred to as being attached or enclosed) is being deposited with the U.S. Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to the: Commissioner for Patents, P.O. Box 1450 Alexandria, VA 22313-1450

HAVERSTOCK & OWENS LLP.

Date: 1-10-06 By:  10-